1 Louis A. Coffelt, Jr.
   louis.coffelt@gmail.com
2 231 E. Alessandro Blvd., Ste 6A-504
   Riverside, CA 92508
3 Telephone: (951) 790-6086

4 *Pro Se* Plaintiff

5 RICHARD S.J. HUNG (State Bar No. 197425)
   rhung@mofo.com
6 ROBIN L. BREWER (State Bar No. 253686)
   rbrewer@mofo.com
7 MORRISON & FOERSTER LLP
   425 Market Street
8 San Francisco, California 94105
   Telephone: (415) 268-7000
9 Facsimile: (415) 268-7522

10 BITA RAHEBI (State Bar No. 209351)
   brahebi@mofo.com
11 ROSE LEE (State Bar No. 294658)
   roselee@mofo.com
12 MORRISON & FOERSTER LLP
   707 Wilshire Boulevard
13 Los Angeles, CA 90017-3543
   Telephone: (213) 892-5428
14 Facsimile: (213) 892-5454

15 Attorneys for Autodesk, Inc.

16

17   UNITED STATES DISTRICT COURT

18   CENTRAL DISTRICT OF CALIFORNIA

19

20 LOUIS A. COFFELT, JR.,   Case No.: 5:17-cv-01684-FMO-SHK

21   Plaintiff,   **JOINT RULE 26(f) REPORT**

22   v.   Date: November 30, 2017
                                         Time: 10:00 a.m.
23   Courtroom: 6D, 6th Floor

24 AUTODESK, INC., a Delaware   Hon. Fernando M. Olguin
   Corporation,
25
                Defendant.
26

27

28

1   Under Rule 26 of the Federal Rules of Civil Procedure, Local Rule 26-1, and

2   the Court's Order Setting Scheduling Conference (ECF No. 23), Plaintiff Louis A.

3   Coffelt, Jr. and Defendant Autodesk, Inc. ("Autodesk") submit this Joint Rule 26(f)

4   Report.

5

6   **I.   ITEMS SPECIFIED BY THE COURT'S NOVEMBER 2, 2017
       SCHEDULING ORDER (ECF NO. 23)**

7   **A.   Statement of the Case**

8   **Coffelt's Position:** Mr. Coffelt is the author of Photorealistic CAD

9   programs. Mr. Coffelt is the sole owner of all rights title and interest in Coffelt's

10   copyrighted works. Mr. Coffelt has not authorized any rights in Coffelt's

11   copyrighted works. Exhibits attached to the complaint show Open Source Shading

12   Language ("OSL") is identical or a derivative of Coffelt's copyrighted works.

13   Exhibits attached to the complaint show OSL results are identical to Coffelt's

14   results. Exhibits attached to the complaint show Autodesk products use OSL.

15   Exhibits attached to the complaint show Autodesk has access to Coffelt's

16   copyrighted works. This case is directed to Defendant's unauthorized copy,

17   distribution, and derivation of Coffelt's copyrighted works.

18   On November 8, 2017, at 707 Wilshire Boulevard, Los Angeles, CA 90017-

19   3543, Mr. Coffelt attended the Parties Rule 26(f) Conference. Counsel

20   for Autodesk, RICHARD S.J. HUNG, joined this Conference by telephone.

21   At this Conference, Mr. Coffelt and Mr. Hung executed the following

22   dialogue:

23   Coffelt: What is Autodesk's defense?

24   Hung: Autodesk does not infringe.

25   Coffelt: That is not a defense, it is a general allegation.

26   In August, Mr. Hung set forth a copyright infringement defense

27   titled:

28   ("Mapped Object Shadow"), what about this?

1

sf-3837489

1   Hung: No Reply, silence for several seconds.

2   Coffelt: I believe the Court will see that Autodesk has no defense.

3   Hung: No reply to this issue of Autodesk defense.

4   **Autodesk's Position:** Mr. Coffelt filed his Complaint for copyright

5   infringement on August 21, 2017, alleging that the ability to create images with

6   realistic shadows using Autodesk's software demonstrates Autodesk's use of

7   Mr. Coffelt's copyrighted works. (Compl. ¶ 20, 41-42.) Mr. Coffelt asserts that

8   Autodesk's use of Sony Imageworks's Open Shading Language ("OSL") gives rise

9   to Autodesk's infringement. (*Id*. ¶¶ 24-26.)

10   According to Mr. Coffelt, after his incarceration and while on parole,

11   California Department of Corrections "CDC" officials forcefully removed copies of

12   his copyrighted works and provided them to Autodesk. (*Id*. ¶¶ 22-23, 78-80.)

13   Mr. Coffelt also alleges that Autodesk "attained access to Coffelt's copyrighted

14   works on February 28, 2013" by reviewing his patent application, U.S. Patent No.

15   8,614,710, when it published. (*Id*. ¶¶ 21, 77.)

16   Mr. Coffelt specifically accuses Autodesk of infringing Copyright No. TXu

17   2-037-997. (*Id*. ¶ 85.) That underlying work was "published/completed" in 2016

18   and first registered at the very end of that year, on December 28, 2016. (*Id*. Ex.

19   126.)

20   Autodesk denies that Mr. Coffelt owns a valid copyright, that Autodesk has

21   infringed or infringes Mr. Coffelt's copyrighted works, and that Mr. Coffelt has

22   stated a claim for which relief may be granted. In particular, the Complaint (1)

23   does not allege plausible facts showing Autodesk's access to his copyrighted works,

24   (2) alleges infringement of an uncopyrightable idea, and (3) is based on a product

25   that predates his copyrighted works. Autodesk previously and repeatedly explained

26   these issues to Mr. Coffelt at the parties' Rule 26(f) conference, but Mr. Coffelt

27   repeatedly interpreted them to mean that Autodesk intended to raise or had no

28   defenses.

2

B.   Subject Matter Jurisdiction

The parties do not dispute that this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, 1338(a), because the claims arise under the copyright laws of the United States, 17 U.S.C. §§ 101, *et seq.* The parties further do not dispute personal jurisdiction and venue for this case in this District.

C.   Legal Issues

The principal legal issues that Mr. Coffelt and Autodesk dispute in connection with the asserted claims are:

1.   Whether Autodesk has infringed Mr. Coffelt's copyright, in violation of Section 501 of the Copyright Act, 17 U.S.C. § 501(a);

2.   Whether Autodesk had access to Mr. Coffelt's copyrighted work;

3.   Whether Autodesk copied Mr. Coffelt's copyrighted work; and

4.   If infringement is found, the amount of damages.

D.   Parties, Evidence, Etc.

Coffelt's Position: Plaintiff is Louis A. Coffelt, Jr.

Key Documents:

1.   Source code of Autodesk, Inc., AutoCAD 2010.

2.   Source code of Autodesk, Inc., AutoCAD 2017.

3.   Source code of Autodesk, Inc., Beast 2011.

4.   Source code of Autodesk, Inc., Beast 2015

5.   Autodesk, Inc. response to Coffelt's Request for Information and Documents No. 1 served on November 8, 2017.

6.   Autodesk.com web pages; contain more than 800 items directed to the term "Photorealistic". Location: public internet servers; and Autodesk servers.

7.   Computer file: TXu002049564 CAD Reflective Intensity. Coffelt's source code.

3

8. Computer file: TXu002035517 Vector Plane Intersection. Coffelt's source code.

9. Computer file: TX0008356641 Steradian Space For Light Occlusion Derivation. Coffelt's source code.

10. Computer file: TX0008411081 CAD Reflective Intensity. Coffelt's source code.

11. Computer file: TX0008400276 emoshaGraphics CAD. Coffelt's source code.

12. Computer file: TXu002049567 Surfaces 3D Position Derivation. Coffelt's source code.

13. Computer file: TX0008411079 User Interface for emoshaGraphics CAD. Coffelt's source code.

14. Computer file: TXu002037997 emoshaGraphics CAD alpha. Coffelt's source code.

15. Computer file: 1-5121154211 Realistic 3D Surface Shading by Reflective Intensity 2010. Coffelt's source code.

16. Computer file: 1-5376971191 Photorealistic Surface Shading by Reflective Intensity 2017. Coffelt's source code.

17. Computer file: 1-5436456281 Photorealistic CAD by Vector Plane Intersection 2017 type VP. Coffelt's source code.

18. Computer file: 1-5467803591 Photorealistic CAD by Vector Plane Intersection 2017 Type R. Coffelt's source code.

19. Computer file: 1-5642087391 3D CAD Cursor with Realistic 3D Motion by 2D Motion. Coffelt's source code.

20. Computer file: 1-5652787911 Photorealistic CAD by Reflection Vector Type VPID. Coffelt's source code.

21. Computer file: 1-5893778271 3D CAD Cursor with Realistic 3D Motion by 2D Motion v1.0. Coffelt's source code.

4

sf-3837489

22. California Department of Corrections and Rehabilitation (CDCR) response to Coffelt's Request for information and documents.

23. CDCR agents depositions

24. Computer File: C:___\EmoshaGraphicsAug2013\X1039Bolt0000.cpp

    Modified/Original Created: Saturday, August 24, 2013, 8:42:09 PM

    Subject matter: Coffelt's CAD work

    Location: Coffelt's Laptop, Service Tag: GMBTY32

25. Computer File: C:___\HexBoltClsX0000a.cpp

    Modified/Original Created: Sunday, August 25, 2013, 9:13:15 AM

    Subject matter: Coffelt's Vector Work / Gradient Work / Steradian Work / CAD Work

    Location: Coffelt's Laptop, Service Tag: GMBTY32

26. Computer File: C:___\CounterTopCls.cpp

    Subject matter: Coffelt's CAD Work

    Modified/Original Created: Sunday, April 28, 2013, 7:32:42 PM

    Location: Coffelt's Laptop, Service Tag: GMBTY32

27. Computer File: C:___\ThreeDaxis.cpp

    Modified/Original Created: Monday, April 29, 2013, 9:15:44 PM

    Subject matter: Coffelt's CAD Work

    Location: Coffelt's Laptop, Service Tag: GMBTY32

28. Computer File: C:___\DeriveComplexParabolicPathDLL0011.h

    Modified/Original Created: Monday, September 16, 2013, 12:28:55 AM

    Subject matter: Coffelt's CAD Work

    Location: Coffelt's Laptop, Service Tag: GMBTY32

29. Computer File: C:___\ColorByReflectionVec.pdf

    Modified/Original Created: Wednesday, October 20, 2010, 8:01:16 AM

5

1   Subject matter: Coffelt's Gradient Work

2   Location: Coffelt's Laptop, Service Tag: GMBTY32

3   30.   Computer File: C:___\ColorByReflectionVecA.pdf

4   Modified/Original Created: Monday, October 18, 2010, 5:48:40 PM

5   Subject matter: Coffelt's Gradient Work

6   Location: Coffelt's Laptop, Service Tag: GMBTY32

7   31.   Computer File: C:___\VectorScreenIntersection.pdf

8   Modified/Original Created: Sunday, October 17, 2010, 10:47:54 PM

9   Subject matter: Coffelt's Vector Work

10   Location: Coffelt's Laptop, Service Tag: GMBTY32

11   32.   Computer File: C:___\WriteBitmapsDLL.h

12   Modified/Original Created: Saturday, January 19, 2013, 11:03:28 AM

13   Subject matter: Coffelt's CAD Work

14   Location: Coffelt's Laptop, Service Tag: GMBTY32

15   33.   Computer File: C:___\BitmapToBinary.h

16   Modified/Original Created: Sunday, January 06, 2013, 5:52:48 PM

17   Subject matter: Coffelt's CAD Work

18   Location: Coffelt's Laptop, Service Tag: GMBTY32

19   34.   Computer File: C:___\ConvertBinToDoubles.h

20   Modified/Original Created: Sunday, January 06, 2013, 5:20:08 PM

21   Subject matter: Coffelt's CAD Work

22   Location: Coffelt's Laptop, Service Tag: GMBTY32

23   35.   Computer File: C:___\SteradiansCopyright.pdf

24   Modified/Original Created: Saturday, November 03, 2012, 9:36:02 PM

25   Steradian Work

26   Location: Coffelt's Laptop, Service Tag: GMBTY32

27   36.   Computer File: C:___\XYZvectorsClsX.cpp

28   Modified/Original Created: Friday, January 04, 2013, 10:20:26 PM

6

1   Subject matter: Coffelt's CAD Work

2   Location: Coffelt's Laptop, Service Tag: GMBTY32

3   37.   Hard Drive containing Coffelt's copyrighted work, date file created

4   2010; 2013. Location: Coffelt's possession.

5   38.   CD with Coffelt's copyrighted work Vector Work / Gradient Work,

6   date file created 2010. Location: Coffelt's possession

7   39.   Witness: T. Baker, California Department of Corrections and

8   Rehabilitation (CDCR) Supervisor.

9   subject matter: Autodesk access to Coffelt's copyrighted works.

10 40.   Witness: Juana Clark (4808), Coffelt's CDCR parole agent.

11 subject matter: Autodesk access to Coffelt's copyrighted works.

12 41.   Witness: Ernandez, Coffelt's CDCR parole agent.

13 subject matter: Autodesk access to Coffelt's copyrighted works.

14 42.   Witness: 8 unnamed CDCR agents.

15 subject matter: Autodesk access to Coffelt's copyrighted works.

16 43.   All correspondence between Coffelt and Autodesk, Inc. Location:

17 Coffelt's Laptop, Service Tag: GMBTY32.

18 44.   All correspondence between Coffelt and counsel for Autodesk, Inc.

19 Location: Coffelt's Laptop, Service Tag: GMBTY32.

20 45.   Any Autodesk publication, including, not limited to:

21 a.   title: (Photorealistic Rendering Techniques in Autodesk®

22 AutoCAD®) by David Cohn at page 2 alleges "AutoCAD can

23 now display models with realistic materials, lighting, and

24 shadows." Does not rely on publication date. Location: public

25 internet servers; and Autodesk servers.

26 b.   Any web page containing the term "photorealistic". Location:

27 public internet servers; and Autodesk servers.

28

7

sf-3837489

46. Open Source Shading Language (OSL) source code by Larry Gritz. Location: public internet servers; and Autodesk servers.

47. All results of Coffelt's copyrighted works. e.g. photorealistic digital images. Location: Coffelt's Laptop Computer, Service Tag: GMBTY32;

Coffelt's Computer Hard Drive; and results can be demonstrated to this Court by Coffelt's computer running Coffelt's Copyrighted works source code.

48. Results of OSL source code. e.g. photorealistic digital images.

49. Results of all Autodesk's products source code, including and all versions of AutoCad, Fusion 360, Maya, InfraWorks, AutoCAD Civil 3D, Revit, Inventor, and Beast. e.g. photorealistic digital images.

50. All Coffelt's U.S. Copyright Certificates of Registration Location: In Coffelt's possession.

51. All Coffelt's copyrighted source code. Location: In Coffelt's possession.

52. Coffelt's Rule 26(a)(1)(A)(i),(ii),(iii) disclosures served on Autodesk On November 8, 2017 by email having a title: ("Coffelt's Fed. R. Civ. P. Joint Rule 26(f) Report Points").

Autodesk's Position: Autodesk has no parent. A list of Autodesk's subsidiaries is attached to the Joint Rule 26(f) Report as Exhibit A. Potentially relevant evidence includes:

1. Copies of the copyrighted works;

2. Sony Pictures Imageworks' Open Shading Language; and

3. Documents supporting Mr. Coffelt's allegations that CDC agents removed copies of Mr. Coffelt's copyrighted works.

Because Mr. Coffelt's allegations in his Complaint are based on Autodesk's use or incorporation of OSL, Autodesk disagrees that Autodesk's source code for its

8

sf-3837489

1 products is relevant to this litigation. Autodesk currently is unaware of any

2 percipient witnesses besides Mr. Coffelt.

3 **E.   Expert Discovery and Testimony**

4 **Coffelt's Position:** Plaintiff, Louis A. Coffelt, Jr., is an expert in CAD

5 programming. Louis A. Coffelt, Jr. will provide Expert Testimony at trial.

6 Mr. Coffelt believes that Mr. Coffelt should be entitled to directly access

7 Autodesk's source code. Mr. Coffelt is capable to demonstrate to this Court the

8 functions, purpose, and results of Autodesk's source code. Mr. Coffelt is capable to

9 demonstrate to this Court the functions, purpose, and results of Coffelt's source

10 code. Mr. Coffelt needs more time to review Autodesk's proposed protective order.

11 Coffelt believes there should be no prosecution bar. Mr. Coffelt does not

12 completely understand the meaning of "prosecution bar" in the following Autodesk

13 Position at this time. Therefore, Mr. Coffelt will respond to this issue at the

14 Scheduling Conference on November 30, 2017.

15 **Autodesk's Position:** The Federal Rules of Civil Procedure (e.g., Rules

16 26(a)(2) and 26(b)(4)) and the Local Rules of this Court govern discovery and

17 testimony from experts in this case. Were this case to case proceed to trial,

18 Autodesk expects that it would offer a technical expert and a damages expert.

19 Autodesk disagrees that Mr. Coffelt should be entitled to directly access

20 Autodesk's source code, if such production is required. Autodesk further believes

21 that any review of its confidential information be under the protections of a suitable

22 protective order with source code provisions and a prosecution bar.

23 **F.   Insurance**

24 There is no insurance coverage for the issues presented in this case.

25 **G.   Magistrate Judge**

26 The parties do not consent to a magistrate judge presiding over this action for

27 all purposes, including trial.

28

9

H.   Discovery

A proposed schedule is set forth below as to discovery, including expert deadlines. In addition, the parties agree that this case will be governed by the default limits on discovery under the Federal Rules of Civil Procedure. The parties will seek entry of a protective order for this case.

I.   Motions

Coffelt's Position: Coffelt intend to amend the complaint to add copyright infringement claims against Autodesk directed to the following copyrighted works:

1.   TX0008411081 date of registration: January 13, 2017
        Title: CAD Reflective Intensity

2.   TX0008400276 date of registration: January 13, 2017
        Title: emoshaGraphics CAD

3.   TX0008356641 date of registration: December 15, 2016
        Title: Steradian Space For Light Occlusion Derivation

4.   TXu002035517 date of registration: December 14, 2016
        Title: Vector Plane Intersection

5.   TXu002049564 date of registration: December 13, 2016
        Title: CAD Reflective Intensity

Mr. Coffelt is considering whether to add Autodesk Executives as individuals as Defendants in this action. Mr. Coffelt is considering whether to file a separate copyright infringement action against Autodesk Executives as individuals.

Autodesk's Position: Autodesk has filed a motion to dismiss for failure to state a claim on which relief may be granted. (ECF No. 21.) Among other things, (1) Mr. Coffelt has failed to allege plausible facts showing Autodesk's access to his copyrighted works, (2) Mr. Coffelt alleges infringement of an unncopyrightable idea, and (3) Mr. Coffelt basis his infringement allegations on software that predates his copyrighted work. A hearing is scheduled for November 30, 2017.

10

sf-3837489

1   Autodesk disagrees that it would be appropriate for Mr. Coffelt to amend his

2   Complaint to accuse Autodesk's executives of copyright infringement. Before

3   filing this lawsuit, Mr. Coffelt attempted to engage Autodesk's executives by

4   writing them and emailing them directly. But Autodesk is unaware of any facts

5   suggesting that any Autodesk executive personally infringed any of Mr. Coffelt's

6   alleged copyrights, and Mr. Coffelt has pointed to no such facts or explained why it

7   would be appropriate to add them to this lawsuit individually.

8   **J.   Class Certifications**

9   This is not a class action.

10   **K.   Dispositive Motions**

11   **Coffelt's Position:** Mr. Coffelt proposes a dispositive motion deadline of

12   February 8, 2018. Mr. Coffelt believes Autodesk will not produce the requested

13   discovery. Therefore, Mr. Coffelt intends to file a motion for summary judgment

14   pursuant to Fed. R. Civ. P. 56(a) against Autodesk claiming that there is no genuine

15   dispute as to any material fact and Plaintiff is entitled to judgment as a matter of

16   law. Autodesk can not defend against the claim of copyright infringement.

17   **Autodesk's Position:** Autodesk believes this case should be resolved on

18   motion to dismiss. To the extent this case is not resolved by that motion, Autodesk

19   proposes a dispositive motion deadline of October 5, 2018.

20   **L.   Settlement/Alternative Dispute Resolution (ADR)**

21   **Coffelt's Position:** In regard to promptly resolving this case: Coffelt

22   believes Autodesk should admit that Autodesk is committing acts of copyright

23   infringement of Coffelt's copyrighted works.

24   In regard to promptly settling this case: Coffelt and Autodesk should discuss

25   an amount Autodesk will pay Coffelt; and discuss whether Autodesk will request a

26   license for Coffelt's copyrighted works.

27   **Autodesk's Position:** In his Complaint, Mr. Coffelt seeks damages of $33

28   billion. In light of Mr. Coffelt's demand, Autodesk does not agree that informal

11

1 settlement discussions will be productive. The parties have agreed, however, to the

2 involvement of a magistrate judge as a settlement judge for ADR purposes.

3 **M.   Pretrial Conference and Trial**

4 **Coffelt's Position:** Mr. Coffelt proposes a pretrial conference on February

5 15, 2018, and that trial commence on March 2, 2018.

6 **Autodesk's Position:** Autodesk proposes a pretrial conference on December

7 7, 2018, and that trial commence on or after January 7, 2019.

8 **N.   Trial Estimate**

9 **Coffelt's Position:** Mr. Coffelt estimates trial will take three days and he

10 will call four witnesses.

11 **Autodesk's Position:** Autodesk estimates trial will take no longer than one

12 week. In view of Mr. Coffelt's intent to amend the complaint to add defendants,

13 Autodesk is unable to identify the number of witnesses it expects to call at trial.

14 **O.   Trial Counsel**

15 **Coffelt's Trial Counsel:** Mr. Coffelt will appear pro se at trial.

16 **Autodesk's Trial Counsel:** Mr. Richard S.J. Hung and Morrison & Foerster

17 LLP will try this case should it proceed to trial.

18 **P.   Independent Expert or Master**

19 **Coffelt's Position:** Mr. Coffelt believes an Independent Expert or Master

20 may be required dependent on future developments in this case.

21 **Autodesk's Position:** Autodesk does not believe this case requires a special

22 master or independent scientific expert.

23 **Q.   Other Issues**

24 The parties did not identify additional issues that may affect the status or

25 management of this case.

26

27

28

12

sf-3837489

II. REMAINING TOICS IDENTIFIED IN FEDERAL RULE OF CIVIL PROCEDURE 26-1

As to topics identified under Rule 26, which are not discussed above, the parties provide as follows:

A. Exchange of Rule 26(a)(1) Disclosures

Coffelt's Position: On November 8, 2017, Mr. Coffelt served Autodesk with Rule 26(a)(1)(A)(i), (ii), (iii) disclosures by email having a title: ("Coffelt's Fed. R. Civ. P. Joint Rule 26(f) Report Points"); and file name: ("coffelt_26f_joint_report_points_1_.pdf"). This Joint 26(f) Report Section V includes Coffelt's Rule 26(a)(1)(A)(i)(ii) disclosures.

Autodesk's Position: During the meet and confer, the parties agreed to exchange initial disclosures on November 17, 2017. Autodesk has reviewed the document served by Mr. Coffelt on November 8, 2017, and has been unable to identified disclosures for Rule 26(a)(1)(A)(i) and (ii).

B. Preservation of Evidence

Mr. Coffelt and Autodesk have taken or are taking appropriate steps to preserve any and all evidence that may be of relevance to the issues in the present action.

III. REMAINING TOPICS IDENTIFIED IN LOCAL RULE 26-1

A. Complex Case

The parties agree that this case is not complex and that the procedures of the Manual for Complex Litigation should not apply.

B. Expert Witnesses

The parties propose that expert disclosures be made according to the proposed case schedule below.

13

sf-3837489

IV.   PROPOSED SCHEDULE

Event	Agreed Upon Dates	Plaintiff's Proposed Date	Defendant's Proposed Dates
Initial Disclosures	November 17, 2017		
Last day to amend pleading or add parties without leave of Court		February 14, 2018	December 14, 2017
Last day to complete ADR		December 31, 2017	May 25, 2018
Close of fact discovery		February 8, 2018	June 22, 2018
Last day to exchange Opening Expert Reports		February 8, 2018	July 20, 2018
Last day to exchange Rebuttal Expert Reports		February 21, 2018	August 17, 2018
Close of expert discovery		February 21, 2018	September 7, 2018
Last day to file dispositive motions		February 8, 2018	October 5, 2018
Last day for hearing motions		February 21, 2018	November 9, 2018
Proposed final pretrial conference		February 15, 2018	December 7, 2018
Trial		March 2, 2018	On or after January 7, 2019

Dated: November 16, 2017

By:_____ */s/ Louis A. Coffelt, Jr.* _____   */s/ Richard S.J. Hung* _____
           Pro Se Plaintiff   Richard S.J. Hung
                                                                         MORRISON & FOERSTER LLP

                                                                         Attorneys for Defendant
                                                                         AUTODESK, INC.

14

sf-3837489

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule No. 5-4.3.4(a)(2), I hereby attest that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a "conformed" signature (/s/) within this e-filed document.

15

sf-3837489

EXHIBIT A

Autodesk's List of Subsidiaries

Subsidiary Name	Jurisdiction of Incorporation
Autodesk Americas LLC	U.S.
ADSK Ireland Limited	Ireland
Autodesk (China) Software Research and Development Co., Ltd.	China
Autodesk (EMEA) Sàrl	Switzerland
Autodesk AB	Sweden
Autodesk ApS	Denmark
Autodesk Asia Pte. Ltd.	Singapore
Autodesk Australia Pty Ltd.	Australia
Autodesk B.V.	The Netherlands
Autodesk Canada Co.	Canada
Autodesk Colombia S.A.S.	Colombia
Autodesk DC B.V.	The Netherlands
Autodesk DC Limited	United Kingdom
Autodesk de Argentina S.A.	Argentina
Autodesk de Mexico, S.A. de C.V.	Mexico
Autodesk de Venezuela, S.A.	Venezuela
Autodesk Development B.V.	The Netherlands
Autodesk Development S.à r.l.	Switzerland
Autodesk Direct Limited	United Kingdom
Autodesk do Brasil Ltda	Brazil
Autodesk ehf.	Iceland

16

sf-3837489

Subsidiary Name	Jurisdiction of Incorporation
Autodesk Far East Ltd.	Hong Kong
Autodesk France	France
Autodesk Ges.mbH	Austria
Autodesk GmbH	Germany
Autodesk Holdings LLP	United Kingdom
Autodesk Hungary Kft	Hungary
Autodesk India Private Limited	India
Autodesk International Holding Co.	U.S.
Autodesk Israel Ltd.	Israel
Autodesk Korea Ltd.	South Korea
Autodesk Limited	United Kingdom
Autodesk Limited	Saudi Arabia
Autodesk Ltd. Japan	Japan
Autodesk Netherlands Holdings, B.V.	Netherlands
Autodesk S.r.l.	Italy
Autodesk S.R.L.	Romania
Autodesk SA	Switzerland
Autodesk Software (China) Co., Ltd.	China
Autodesk Sp. z.o.o.	Poland
Autodesk Spol. S.R.O.	Czech Republic
Autodesk Strategies Ltd.	China
Autodesk Taiwan Limited	Taiwan
Autodesk UK Holdings Limited	United Kingdom

17

sf-3837489

Subsidiary Name	Jurisdiction of Incorporation
Autodesk Yazilim Hizmetleri Ticaret Limited Sirketi (Autodesk Limited Sirketi)	Turkey
Autodesk, S.A.	Spain
Beijing Delcam Integrated System Co. Ltd.	China
CadSoft Computer GmbH	Germany
Configure One, Inc.	U.S.
Configure One Europe Limited	United Kingdom
Configure One Holdings Limited	United Kingdom
Creative Market Labs, Inc.	U.S.
Crispin Systems Limited	United Kingdom
Delcam (Hong Kong)	China
Delcam (Malaysia) Sdn. Bhd.	Malaysia
Delcam Australia Pty Limited	Australia
Delcam Consulting and Technology Services Limited	India
Delcam Danmark ApS	Denmark
Delcam Engineering Services (Thailand) Co., Ltd.	Thailand
Delcam Indonesia	Indonesia
Delcam Limited	United Kingdom
Delcam Partmaker Limited	United Kingdom
Delcam Professional Services Limited	United Kingdom
Delcam Software (India) Private Limited	India
Delcam Ukraine	Ukraine
Delta Soft LLC	Russia

18

sf-3837489

Subsidiary Name	Jurisdiction of Incorporation
Graitec GmbH	Germany
Graitec SAS	France
Hanna Strategies Holdings, Inc.	U.S.
Limited Liability Company Autodesk (CIS)	Russia
Magestic Systems, Inc.	U.S.
Moldflow B.V.	The Netherlands
Moldflow International Pty Ltd.	Australia
Moldflow Pty Ltd.	Australia
Moldflow Singapore Pte Ltd	Singapore
netfabb GmbH	Germany
netfabb, Inc.	U.S.
SeeControl, Inc.	U.S.
SCI Topole	France
Shotgun Software Inc.	U.S.
Solid Angle, S.L.U.	Spain
Solid Angle Limited	United Kingdom
Within Technologies	United Kingdom

19

sf-3837489